

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X -----
IN RE: : 22-md-3028 (PAE)
: :
: :
: ONE APUS CONTAINER SHIP INCIDENT ON : Hon. Paul A. Engelmayer
: NOVEMBER 30, 2020 :
: :
This Document Relates To: : **NOTICE OF PLAINTIFFS'**
AIT Worldwide Logistics, Inc., et al. v. M/V ONE : **MOTION FOR LEAVE TO**
APUS, in rem, et al., C.A. 1:22-05220. : **FILE FIRST AMENDED**
: **COMPLAINT**
: :
----- X -----

PLEASE TAKE NOTICE that Plaintiffs, AIT Worldwide Logistics, Inc. ("AIT"), TopOcean Consolidation Service (Los Angeles), Inc. ("TopOcean"), and Worldbridge Logistics, Inc. ("Worldbridge"), will move pursuant to Rule 15(a) and Rule 21 of the Federal Rules of Civil Procedure before the Hon. Paul A. Engelmayer, U.S.D.J. for the Southern District of New York at 40 Foley Square, New York, New York 10007, for an Order granting Plaintiffs Leave to File their Motion for Leave to File their First Amended Verified Complaint adding Defendants, Chidori Ship Holding LLC, Jessica Ship Holdings LLC, and NYK Shipmanagement Pte Ltd.; and

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the accompanying Memorandum of Law.

September 29, 2022.



Robert L. Reeb – Admitted *Pro Hac Vice*
Kenderick M. Jordan – Admitted *Pro Hac Vice*
Marwedel, Minichello & Reeb, P.C.
303 W. Madison St., Suite 1100
Chicago, Illinois 60606
P: (312) 902-1600
F: (312) 902-9900
rreeb@mmr-law.com
kjordan@mmr-law.com

George W. Wright
Narinder S. Parmar
George W. Wright & Associates, LLC
88 Pine Street, 7th Floor
New York, New York 10005
P: (201) 342-8884
F: (201) 343-8869
gwright@wright-associate.com
nparmar@wright-associate.com

*Attorneys for AIT Worldwide Logistics, Inc.;
TopOcean Consolidation Service (Los
Angeles), Inc.; and Worldbridge Logistics, Inc.*

Granted.

SO ORDERED.

PAUL A. ENGELMAYER
United States District Judge
September 30, 2022